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*The proposed motion described
herein may be held without a
run conference. So ordered.*
June 23, 2008

W. [Signature] 7/17/08

VIA HAND DELIVERY

The Honorable Lawrence M. McKenna
United States District Court
Southern District of New York
500 Pearl Street, Room 1640
New York, New York 10007-1213

MEMO ENDORSED

RECEIVED
IN CHAMBERS

JUN 23 2008

LAWRENCE M. MCKENNA
U.S. DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Re: *Adelphia Recovery Trust v. Prestige Communications of NC, Inc., et al.*,
Civil Action File No. 07 Civ. 11152(LMM), United States District Court,
Southern District of New York

Dear Judge McKenna:

We represent Prestige Communications of NC, Inc., Jonathan J. Oscher, Lorraine Oscher McLain, Robert F. Buckfelder, The Buckfelder Investment Trust, and Anverse, Inc. (collectively, the "Defendants") in the above-captioned matter. On behalf of the Defendants, we write pursuant to Local Rule 37.2 of the Local Rules of the United States District Court for the Southern District of New York to request an informal conference with the Court concerning the Defendants' forthcoming motion to compel Plaintiff to produce all withheld expert materials from the case styled *Adelphia Communications Corp. v. Deloitte & Touche, LLP*, Case No. 000598 (Pa. Ct. Comm. Pl. Co. November Term 2002) (the "Deloitte Litigation"), including but not limited to (a) all of Adelphia's expert reports and expert deposition transcripts, including any exhibits thereto; and (b) Deloitte & Touche's expert deposition transcripts, including any exhibits thereto (collectively, the "Deloitte Materials").

Plaintiff has failed to produce the Deloitte Materials, which Defendants respectfully submit are clearly relevant to this case because of Plaintiff's allegations of insolvency and/or inadequate capitalization. The Defendants have, in good faith, attempted to secure the production of the Deloitte Materials without judicial intervention. These efforts have proven unsuccessful as Plaintiff has failed to produce all of the Deloitte Materials.

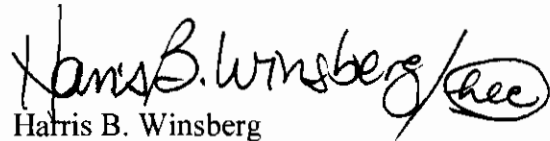
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We do note that some of the defendants in the case styled *Adelphia Recovery Trust v. Bank of America, N.A., et al.*, 05 Civ. 9050 (LMM) (the "Bank Litigation") have already filed a motion to compel, seeking the same documents. In light of the pending motion to compel in the Bank Litigation, Plaintiff does not oppose Defendants' submission of this letter.

For these reasons, the Defendants intend to move to compel Plaintiff to produce the Deloitte Materials. We are available at Your Honor's convenience should the Court wish to schedule an informal conference, set a briefing schedule or otherwise discuss this matter.

Respectfully,

The signature is handwritten in black ink, reading "Harris B. Winsberg" followed by a circled "hee".
Harris B. Winsberg

HBW:bkf
cc: Joseph A. Gershman, Esq.

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